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Robert Moser, MD, Secretary.

Department of Health & Environment

Sam Brownback, Governor

December 6, 2013

Brenda B. Epperson
Environmental Manager
MRP Properties Company, LLC
P.O. Box 696000
San Antonio, TX 78269-6000

RECEIVED

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AWMD/WRAP-KNRP

**RE: Approval of Interim Measures Operation and Maintenance Plan
MRP Properties Company, LLC
1400 South M Street, Arkansas City, Kansas
RCRA ID# KSD087418695**

Dear Ms. Epperson,

The Kansas Department of Health and Environment (KDHE) and the U.S. Environmental Protection Agency (EPA) Region 7 have reviewed the November 25, 2013 letter from MRP Properties Company, LLC (MRP) transmitting a revised Part II Permit Interim Measures Operation and Maintenance (IMOM) Plan. This IMOM Plan is required under Section III.D.5. of the Part II Permit and describes the interim measure corrective action system at the facility and details the operation and maintenance of this system. Interim measures have been implemented at the facility to recover free product and to prevent releases of hazardous constituents above the groundwater protection standards, specified in Attachment B of the Part I Permit, to the Walnut River. The interim measure corrective action covers areas not addressed by Section IV of the Part I Permit and includes measurement of the dissolved phase hydrocarbon and free product plumes at the facility. KDHE conditionally approves the revised Part II Permit IMOM Plan at this time. This is with the caveat that, as new information or data becomes available on the project, KDHE and EPA may request modification of the interim measure corrective action system at any time in order to ensure interim measure objectives are achieved. The Part II IMOM Plan cost estimate remains under review by EPA, with comments provided on November 21, 2013, and will be approved separately by the EPA.

If you have any questions or concerns regarding this letter, please contact me by phone at (785)-291-3760 or e-mail at (mvishnefske@kdheks.gov).

Sincerely,

Mark Vishnefske
Environmental Scientist III
Hazardous Waste Permits Section
Corrective Action & Geology Unit

cc: Jay Mednick – MWH
Brad Roberts – EPA Region VII - AWMD/WRAP
Allison Herring – DEA/SCDO/Waste Programs
Bill Bider – BWM

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